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December 3, 2012

Via ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07101

Re: *Hoffman v. Time Warner Cable, Inc.*
Civil Action No. 12-cv-978 (ES)(CLW)

Dear Judge Waldor:

This firm represents Plaintiff, Harold M. Hoffman, in the referenced action.

I write to respectfully request an additional 90-day extension of the discovery order entered by Your Honor on October 5, 2012 (Doc. No. 29). Time Warner Cable does not oppose Plaintiff's request.

This request is premised on the parties' goal of allowing Judge Debevoise to issue a decision on Time Warner Cable's pending Rule 12(b)(6) motion, prior to expending both sides' resources on further discovery in advance of that ruling. The transfer of the motion from Judge Salas to Judge Debevoise understandably may have delayed the motion's disposition. Plaintiff respectfully seeks to synchronize the parties' discovery efforts with the Court's ruling on the merits of the underlying claims.

If granted, this application would extend the conclusion of both parties' class discovery for 90 days from the existing January 10, 2012 deadline, and would replace the scheduled January 8, 2013 conference call with the Court for one on a new date to be determined by Your Honor.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'PC'.

PHILIP C. CHRONAKIS

cc: Jonathan D. Thier, Esq.
Brian T. Markley, Esq.
John A. Eakins, Esq.
William E. Goydan, Esq.
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